COMES BUT BUT BESTER.

PRG

October 25, 2007

Chairman Kevin J. Martin
Commissioner Jonathan S. Adelstein
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Deborah Taylor Tate
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554



Re:

Proposal to Allow Unlicensed Operations in the TV Broadcast Bands

ET Docket No. 04-186

Dear Chairman Martin and Commissioners Adelstein, Copps, McDowell and Tate:

We are writing to express our interest in the status of this proceeding and we continue to watch it closely. While we continue to hold hope that the TV Band can and will be more efficiently managed as a result of this proceeding, we do want to simultaneously urge you to proceed with caution and to take all possible measures to openly field test and protect wireless microphone technology from all interference.

Wireless technology is an integral part of virtually all live productions today. Radio frequency coordination at shows, conventions, concerts and sporting events is a daunting challenge even in today's spectrum environment. In performance venues around the country and on Broadway wireless microphone technology is used to enhance the experience for audiences and performers.

Production Resource Group (PRG) is in the entertainment technology business. Our state-of-the-art equipment is used by audio designers' for productions and installations from budding young artists in high schools and summer stock theatres to Broadway and National tours.

Performers and audiences alike depend on us to deliver a first-class audio and visual experience. Accordingly we believe that responsible "white spaces" legislation must allow the FCC to continue its scientific analysis to develop an understanding of the extent of interference to wireless microphones once the new, relatively high-powered, unlicensed devices begin operating in the TV band. Unless properly tested and regulated these new devices have the potential to cause catastrophic problems throughout the country, particularly in the major metropolitan markets. We feel a solution that relies on sound engineering – not politics- can allow these new devices to work in harmony with existing wireless microphone systems without causing crippling interference.

The bottom line, from our perspective, is that the Commission is well-served to rely on its engineers to develop a tight interference-free solution to the white spaces issue before allowing new products into the market. We've heard from some interested parties that one such resolution could include a policy that would limit new gear to "fixed" unlicensed device applications. We would urge the Commission to look at that proposal as well as all others that provide meaningful and comprehensive interference protections for wireless microphone transmissions.

Sincerely

Darren P. DeVerna

President, Northeast Operations

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